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April 14, 2021

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Yury Mosha, 21 CR 92 (AJN)

Dear Judge Oetken,

I write on behalf of the defendant, Yury Mosha, in the above-referenced case to request a modification of the conditions of his release.

Mr. Mosha was arrested on February 18, 2021 on the instant Superseding Indictment and presented before Magistrate Judge Katharine H. Parker the following day. Following his initial appearance, Mr. Mosha was released on the following agreed-upon conditions:

- a \$300,000 personal recognizance bond cosigned by four (4) financially responsible persons;
- travel restricted to SDNY/EDNY;
- surrender travel documents and no new applications;
- supervision as directed by Pretrial Services; and,
- home incarceration with GPS monitoring.

On August 23, 2021, Judge Nathan granted a request to modify the conditions of his release, allowing Mr. Mosha to be placed on curfew with GPS monitoring, the hours of which were to be set at the direction of Pretrial Services. R. 96. That was

the second request for modification of the conditions of Mr. Mosha's release that Judge Nathan granted without incident. *See*, R. 56. Since then, Mr. Mosha has had no violations or alleged violations of his pretrial release. He has been fully compliant.

Mr. Mosha respectfully moves this Court to modify his conditions of release to remove him from curfew and location monitoring with all other conditions to remain the same. Mr. Mosha further moves this Court to allow him to travel outside of SDNY/EDNY so long as his itinerary is given to Pretrial Services ahead of time and the travel approved by them.

The undersigned has spoken to Pretrial Services Office Francesca Piperto, who indicated that Pretrial Services has no objection to modifying the bail conditions for permanent removal of curfew with location monitoring. Ms. Piperto further indicated that Pretrial Services has no objection to travel requests once the curfew condition is lifted so long as Mr. Mosha provide them with proof of travel itinerary prior to any travel.

The undersigned has also spoken to Assistant United States Attorney Jonathan Rebold who indicated that the government defers to Pretrial Services as to each specific request.

Thank you for your consideration.

Respectfully submitted,

Vadim A. Glozman

cc: Assistant U.S. Attorney Jonathan Rebold (via ECF)
Assistant U.S. Attorney David Felton (via ECF)
Pretrial Services Officer Francesca Piperato (via email)

Granted. Curfew with location monitoring is hereby removed from defendant's conditions of pretrial release on bail and travel outside of the district is granted provided pretrial services approves of the travel itinerary.
So ordered.
5/12/2022



J. PAUL OETKEN
United States District Judge